

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, FACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG and
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

Civil Action No. 1:04-cv-11923 (DPW)

District Judge Douglas P. Woodlock

Magistrate Judge Robert B. Collings

**DECLARATION OF DIVYA NARENDRA IN SUPPORT OF PLAINTIFF'S
SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION
TO DISMISS, PRESENTING NEW EVIDENCE AND SUPPLEMENTAL
AUTHORITY IN VIEW OF PRAMCO**

I, DIVYA NARENDRA, declare as follows:

1. On and prior to September 2, 2004, the oral agreement between the Harvard Connection founders, Tyler and Cameron Winklevoss, and I, was that only Cameron and Tyler were Members of ConnectU LLC.
2. Prior to the formation of ConnectU LLC, I accepted a job offer from Credit Suisse in New York, that would begin in July of 2004. I expected to have little time to devote to ConnectU starting in July of 2004. Because of my job, I was unable to contribute time or effort to ConnectU on or about September 2, 2004. At that time, I was uncertain what, if any, contributions I could make to ConnectU, monetary or otherwise, or whether I wanted to assume any of ConnectU LLC's potential liabilities.
3. Because our respective roles, contributions, and shares in the company were uncertain, I was not made a Member of ConnectU LLC until well after September 2, 2004.
4. Although Tyler, Cameron and I had agreed that I would benefit in some way from ConnectU LLC, it had not been discussed or decided whether such benefit would come from Membership in the LLC or some other vehicle, such as a contract.
5. As of September 2, 2004, I viewed ConnectU LLC as the formal entity to run the connectu.com website, and it was my intention that it owned all rights I held as a Harvard Connection founder.
6. Prior to July 2005, I had discussions with counsel about ConnectU's ownership of my rights in the website that was to be known as Harvard Connection, and my rights in the connectu.com website.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration is executed on the 12 day of June 2006.

/s/Divya Narendra
Divya Narendra

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 12, 2006.

/s/ John F. Hornick _____

John F. Hornick